

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

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The State of Texas
ex rel. ALEX DOE, Relator,

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CIVIL ACTION NO. 2:21-CV-00022-Z

The State of Louisiana
ex rel. ALEX DOE, Relator,

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Plaintiffs,

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V.

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Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

ପାତ୍ରାବ୍ଦୀ

Defendants.

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DECLARATION OF RICHARD HOLDER

I, Richard Holder, hereby declare:

1. I am employed by Planned Parenthood of Greater Texas, Inc. (“PPGT”). My official title is Senior Director of Business Operations. In this role, I am responsible for managing information technology and the electronic healthcare system.
2. I am not a president, vice president, officer, or managing or general agent of PPGT, and I have never been authorized to perform the chief executive function of the organization.

3. I am not an agent authorized to accept service on PPGT's behalf.
4. On Thursday January 13, 2022, at or around 1:50 pm, a courier arrived at Planned Parenthood of Greater Texas's Dallas office, located at 7424 Greenville Avenue, Suite 206; Dallas, TX 75231.
5. I answered the office's doorbell, and the courier attempted to serve me with a copy of the Complaints filed by the Relator and the State of Texas and Summons from this case ("Complaints and Summons"). I informed the courier that I was unable to accept service of process.
6. The courier told me that the documents were for Ken Lambrecht, who is the President & CEO of PPGT. Mr. Lambrecht was not in the office at the time. I again advised the courier that I could not accept the documents.
7. About five minutes later, the courier returned to the office and, again, I maintained that I could not accept the documents.
8. The courier placed the Complaints and Summons outside the doors to PPGT's office and left.

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct.

DATED: February 11, 2022

RH

By: 

Name: Richard Holder
Title: Senior Director of Business
Operations, Planned Parenthood of
Greater Texas, Inc.